

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Reexamination of Roaming Obligations of)	WT Docket No. 05-265
Commercial Mobile Radio Service Providers)	

To: Chief, Wireless Telecommunications Bureau

**REQUEST FOR 30-DAY EXTENSION OF
REPLY COMMENT DEADLINE**

The undersigned carriers and trade associations (the “Parties”), representing a diverse cross-section of the wireless industry, hereby request a 30-day extension of the comment deadline in *NPRM* in the above-captioned proceeding¹ from December 27, 2005 to *Thursday, January 26, 2006* in order to review and analyze the voluminous record submitted in the initial comment round and to accommodate the intervening end-of-year holiday period. The parties request expeditious action on the instant request given the upcoming reply comment deadline.

In the *NPRM*, the Commission seeks “up-to-date information on automatic roaming” and has invited interested parties “to discuss in detail” issues pertaining to automatic roaming.² The Commission placed significant emphasis on the need to establish a thorough record in this proceeding and requested specific, granular information on a variety of issues that raise complex economic and technical considerations.³ Commenters have responded accordingly, as numerous

¹ See *In the Matter of Reexamination of Roaming Obligations of Commercial Mobile Radio Service Providers*, WT Docket No. 05-265, *Automatic and Manual Roaming Obligations Pertaining to Commercial Mobile Radio Services*, WT Docket No. 00-193, Memorandum Opinion & Order and Notice of Proposed Rulemaking, FCC 05-160 (rel. Aug. 31, 2005) (“*NPRM*”).

² See *id.* at ¶ 26.

³ See *id.* at ¶¶ 25-49.

parties filed comments totaling hundreds of pages and containing detailed factual data and economic and technical analyses.

The Parties understand that extensions of time for filing deadlines are not routinely granted. The Commission has nonetheless recognized that rulemaking proceedings involving complex technical, economic and competitive issues often warrant an extension of time of comment and reply comment deadlines, particularly when such issues require further studies and analysis and where comments are voluminous.⁴ The 30-day extension of the comment and reply comment deadlines requested herein is of comparatively short duration and will not undermine the Commission's interest in timely completing the instant rulemaking proceeding.⁵ Further, the Commission has also determined that when such issues are under consideration in a rulemaking proceeding, the fact that many interested parties' technical personnel and subject matter experts have scheduled vacation time during the end-of-calendar year holiday season also is a legitimate basis for an extension.⁶

⁴ See, e.g., *Qualcomm Incorporated Petition for Declaratory Ruling*, Order, DA 05-419, ¶ 4 (rel. Feb. 15, 2005) (voluminous comments a basis for extension); *Service Rules for Advanced Wireless Services in the 1915-1920 MHz, 1995-2000 MHz, 2020-2025 MHz and 2175-2180 MHz Bands, Service Rules for Advanced Wireless Services in the 1.7 GHz and 2.1 GHz Bands*, Order, DA 04-3664 (rel. Nov. 19, 2004) (granting 15-day extension due to complex issues raised); *Unlicensed Operation in the TV Broadcast Bands, Additional Spectrum for Unlicensed Devices below 900 MHz and in the 3 GHz Band, Order Granting Extension of Time*, ET Docket Nos. 04-186, 02-380, DA-04-2655, ¶ 4 (OET rel. Aug. 25, 2004) (granting 90-day extension to allow parties to work on technical studies and meet to resolve issues raised in Notice); *Procedures to Govern the Use of Satellite Earth Stations on Board Vessels in the 5925-6425 MHz Bands and 14.0-14.5 GHz/11.7-12.2 GHz Bands, Order Extending Comment Period*, 19 FCC Rcd. 3958, ¶ 2 (IB 2004) (granting 30-day extension due to complex issues raised).

⁵ See *supra* note 4 (Bureau orders granting extensions ranging up to 90 days).

⁶ See, e.g., *Telephone Number Portability, Order*, 18 FCC Rcd. 26604, ¶ 5 (WCB 2003) (granting 3-week extension due to complex technical and competitive issues and impact of holiday); *Digital Broadcast Copy Protection, Order*, 17 FCC Rcd. 19740, ¶¶ 2-3 (MB 2002) (granting 5-week extension to enable commenters "to complete a technical analysis of issues raised by the NPRM" and in recognition of Thanksgiving holiday).

For the reasons set forth above, an extension of time to enable industry to evaluate the voluminous record submitted in the initial comment round. Grant of the requested extension will ensure that the economic and technical information submitted in the record is meaningfully evaluated and commented on in the reply comment round, and is thus consistent with the public interest. Accordingly, the Parties request that the Commission extend the reply comment deadline to Thursday, January 26, 2006.

Respectfully submitted,

RURAL TELECOMMUNICATIONS GROUP, INC.

/s/_____
Kenneth C. Johnson
Bennet & Bennet, PLLC
10 G Street, N.E.
7th Floor
Washington, D.C. 20002
(202) 371-1500

Its Attorney

**ORGANIZATION FOR THE PROMOTION AND
ADVANCEMENT OF SMALL
TELECOMMUNICATIONS COMPANIES**

/s/_____
Stephen Pastorkovich
Senior Policy Analyst
21 Dupont Circle, N.W.
Suite 700
Washington, D.C. 20036
(202) 659-5990

VERIZON WIRELESS

/s/_____
John T. Scott, III
Vice President and Deputy General Counsel –
Regulatory Law
1300 I Street, NW Suite 400 West
Washington, D.C. 20005
(202) 589-3740

Its Attorney

SPRINT NEXTEL CORPORATION

/s/_____
Luisa L. Lancetti
Vice President – Government Affairs,
Wireless Regulatory
401 9th Street, NW - Suite 400
Washington, DC 20004
202-585-1900

Its Attorney

CINGULAR WIRELESS

/s/ David G. Richards
J. R. Carbonell
Carol L. Tacker
David G. Richards
5565 Glenridge Connector, Suite 1700
Atlanta, GA 30342
(404) 236-5543

Its Attorneys

ALLTEL CORPORATION

/s/
Glenn S. Rabin
Vice President
Federal Regulatory Counsel
601 Pennsylvania Ave., NW, Suite 720
Washington, DC 20004
(202) 783-3970

Its Attorney

LEAP WIRELESS INTERNATIONAL, INC.

/s/
James H. Barker
Latham & Watkins
555 11th Street, NW
Suite 1000
Washington, DC 20004
(202) (637-2231)

Its Attorney

December 5, 2005

T-MOBILE USA, INC.

/s/ Kathleen O'Brien Ham
Thomas J. Sugrue
Vice President, Government Affairs
Kathleen O'Brien Ham
Managing Director, Federal Regulatory Affairs
Patrick T. Welsh
Corporate Counsel, Federal Regulatory Affairs
401 9th Street NW, Suite 550
Washington, DC 20004
(202) 654-5922

Its Attorneys

UNITED STATES CELLULAR CORPORATION

/s/
Peter M. Connolly
Holland & Knight, LLP
2099 Pennsylvania Avenue, N.W.
Suite 100
Washington, D.C. 20006
(202) 862-5989

Its Attorney

RURAL CELLULAR ASSOCIATION

/s/
David L. Nace
Lukas, Nace, Gutierrez & Sachs, Chtd.
1650 Tysons Blvd., Suite 1500
McLean, VA 22102
(703) 584-8661

Its Attorney